

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

JO-CARROLL ENERGY, INC.,)
)
 Complainant,)
)
vs.) No. 02-0593
)
ALLIANT d/b/a INTERSTATE POWER)
AND LIGHT CO.,)
)
 Respondent.)

AFFIDAVIT OF RICK M. KNIPFER ON BEHALF OF JO-CARROLL ENERGY, INC.
IN SUPPORT OF THE MOTION FOR SUMMARY JUDGMENT
FILED BY JO-CARROLL ENERGY, INC.

RICK M. KNIPFER, on oath, first duly sworn, states as follows:

1. He is an adult under no disability.
2. If sworn as a witness in the above cause he could competently testify to the following matters.
3. Affiant is a member of the staff of Jo-Carroll Energy, Inc. (Jo-Carroll) and serves Jo-Carroll in the position of Engineering & Operations Manager.
4. Affiant received an Associates Degree in electrical technology from Milwaukee Area Technical College in 1965. Affiant's work experience is as follows:
 - a) Wisconsin Electric from 1967 to 1994 during which time Affiant served 14 years working with distribution line design and the remaining time in supervision and management of line crews and engineering personnel engaged in design, maintenance, installation and operation of the distribution and transmission lines and distribution substations;
 - b) Utility Superintendent for the municipal electric system of the Village of New Glarus, Wisconsin from 1994-1995;

c) Cloverland Electric Cooperative from 1995 to August 2000 as Operations Manager in charge of line crews and operating personnel regarding installation, operation, and maintenance of distribution and transmission lines, distribution substations, and generation facilities.

5. Affiant was employed by Jo-Carroll Energy, Inc. in August 2000 and has worked for Jo-Carroll as the Engineering & Operations Manager since employment. The duties of Affiant as Engineering & Operations Manager include supervision and coordination of the engineering and operation needs of Jo-Carroll which include determination of electrical needs of member consumers; assisting in locating service connections for new members; designing electrical services and the routes for such electrical service to new members and changes in existing service for existing members; acting as liaison for Jo-Carroll with outside suppliers of engineering services and materials; and supervision of other Jo-Carroll personnel who perform duties related to the foregoing described activities.

6. Affiant became acquainted with the proposed service to Jamie Rowe which is at issue in the above cause when the customer requested service from Jo-Carroll. Affiant is further familiar with the locations of Jo-Carroll electric distribution lines as the same existed on July 2, 1965 and subsequent thereto. Exhibit One attached hereto and by reference incorporated herein shows the location of Jo-Carroll electric distribution facilities and electric distribution lines in the area of the customer, Jamie Rowe. Affiant is also familiar with the records of Jo-Carroll as the same pertain to Jo-Carroll's electric distribution facilities; the customers/members/consumers of Jo-Carroll; and the location of member/consumers of Jo-Carroll in or near the customer in the above docket, Jamie Rowe, situated in the East 70 acres of the North Half of Section 26, Township 29 North, Range 2 West of the Fourth Principal

Meridian, Menominee Township, Jo-Daviess County, Illinois. As such, Affiant has searched the records of Jo-Carroll for the purpose of determining the location of all member/consumers of Jo-Carroll situated in the aforesaid area together with the dates service was connected by Jo-Carroll to each such customer and whether such service continues at the present time. Such records show 14 customers served by Jo-Carroll in the area of the Jamie Rowe premises with service being first provided in the area in 1939, all as more fully shown on the attached map marked Exhibit Two which map was prepared under the direction and control of Affiant.

7. Affiant further is familiar with the records of Jo-Carroll that evidence the construction of electric distribution facilities by Jo-Carroll. As such, Affiant has caused a search of the records of Jo-Carroll to be made to locate the work orders evidencing the construction of Jo-Carroll electric facilities north along Indian Ridge Road subsequent to July 2, 1965. Such work order records consist of the construction of two separate extensions and are evidenced by work order #96-00198 dated November 14, 1996 providing for the construction of an electric distribution line extension at a cost of \$11,069.14 less contribution in aid of \$9,250.00 for a total cost to Jo-Carroll of \$1,819.14 north along Indian Ridge Road from Jo-Carroll's east/west July 2, 1965 existing facilities, all as more fully shown by Exhibit Three attached hereto and by reference incorporated herein. Such records further show that work order #97-00394 dated March 6, 1998 provided for the construction of electric distribution facilities northerly along Indian Ridge Road from a point connecting to the north end of the aforementioned work completed under work order #96-00198. Work order #97-00394 was accomplished at a cost of \$2,099.53, all as more fully shown by Exhibit Four attached hereto and by reference incorporated herein.

8. Affiant has further caused to be determined under his direction and control, the

distance from the Jo-Carroll July 2, 1965 existing line to the location of the meter of the customer in the above docket, Jamie Rowe, which distance is 1642 feet as shown by the map attached hereto as Exhibit Five and by reference incorporated herein. In Affiant's opinion this route is practicable for providing electric service to the customer. In addition, Affiant caused to be determined that distance from the Interstate Power and Light Co. (Interstate) July 2, 1965 existing line to the meter of the customer in this docket, Jamie Rowe, which distance, determined in a straight line, is 2557 feet. Affiant further states that the distances were determined by use of the Global Positioning System (GPS), a system utilized by Jo-Carroll for mapping and determining distances which is calculated to be accurate within plus or minus 3 feet and is routinely relied upon by Jo-Carroll in determining distances for designing electric service to new and current customers and determining costs of constructing such service. Such distances are set forth on the map attached hereto as Exhibit Five and by reference incorporated herein which map was prepared under the direction, supervision and control of Affiant; the determination of the aforementioned distances were based upon the location of the Jo-Carroll July 2, 1965 distribution line east of the customer's meter point; the location of the customer's meter as installed by Interstate in this cause; and the location of the closest point on the July 2, 1965 existing Interstate distribution line situated to the west/northwest of the premises of the customer, Jamie Rowe.

9. Affiant has also caused to be determined the distance from the northerly termination point of the Jo-Carroll post 1965 line extension north along Indian Ridge Road to the point at which Interstate tapped its post 1965 line extension south along Indian Ridge Road to extend service to the customer. That distance determined by GPS is 856 feet as shown on the attached Exhibit Five and by reference incorporated herein which map was prepared under the

direction, supervision and control of Affiant.

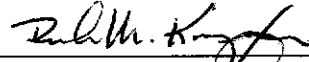
10. Affiant has further caused to be calculated under his supervision and control the cost of providing electric service to the customer, Jamie Rowe, from the Jo-Carroll existing July 2, 1965 distribution line situated immediately east of the Jamie Rowe meter. The cost to Jo-Carroll to extend service from its July 2, 1965 line immediately east of the Jamie Rowe meter is \$8,872.09, all as more fully shown on Exhibit Six attached hereto and by reference incorporated herein. Affiant has further caused to be determined, under his supervision and control, the cost of constructing facilities from the northerly termination point of the Jo-Carroll post 1965 line extension north along Indian Ridge Road to the point where the customer's line taps the Interstate post 1965 line extension south along Indian Ridge Road. The cost to Jo-Carroll for constructing such extension 856 feet is \$4,148.62, all as more fully shown on Exhibit Seven attached hereto and by reference incorporated herein. Extending service the 856 feet along Indian Ridge Road is a practical route for Jo-Carroll to extend service to the customer because of the extensive Jo-Carroll facilities in the area and the increase in need for residential service at that location.

11. The customer's electric needs require service by single phase distribution facilities which Jo-Carroll possesses at the locations shown on Exhibits 1 and 5 attached to the Knipfer Affidavit, Exhibit A, and in Affiant's opinion Jo-Carroll's distribution facilities are adequate to provide such electric service.

12. The customary "normal service connection point" utilized by Jo-Carroll for connecting electric service to a residence is the meter pedestal. The customer in this docket has an installed meter pedestal approximately 100 feet from the customer's residence. Based upon the customary standards followed by Jo-Carroll and based upon accepted engineering

practices, the "normal service connection point" for the customer's residence is the meter pedestal as installed at the present time.

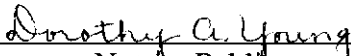
Further Affiant sayeth not.



Rick M. Knipfer

Subscribed and Sworn to before me

this 16th day of December, 2003.


Notary Public



GROSBOLL, BECKER, TICE & REIF

Attorney Jerry Tice

101 East Douglas Street

Petersburg, IL 62675

Telephone: 217/632-2282

\\PETERSBURG\sys\COREL\CONVERT\TELEC\jocarrollknipferaff.wpd

JO-CARROLL ENERGY -- 793 U.S. ROUTE 20 WEST -- ELIZABETH, ILLINOIS 61028 -- (815) 858-3311

STAKING SHEET

Workorder # 0 Job # 0 Customer Name: Member Number: 0 Location: 0



To Carroll
1965 line

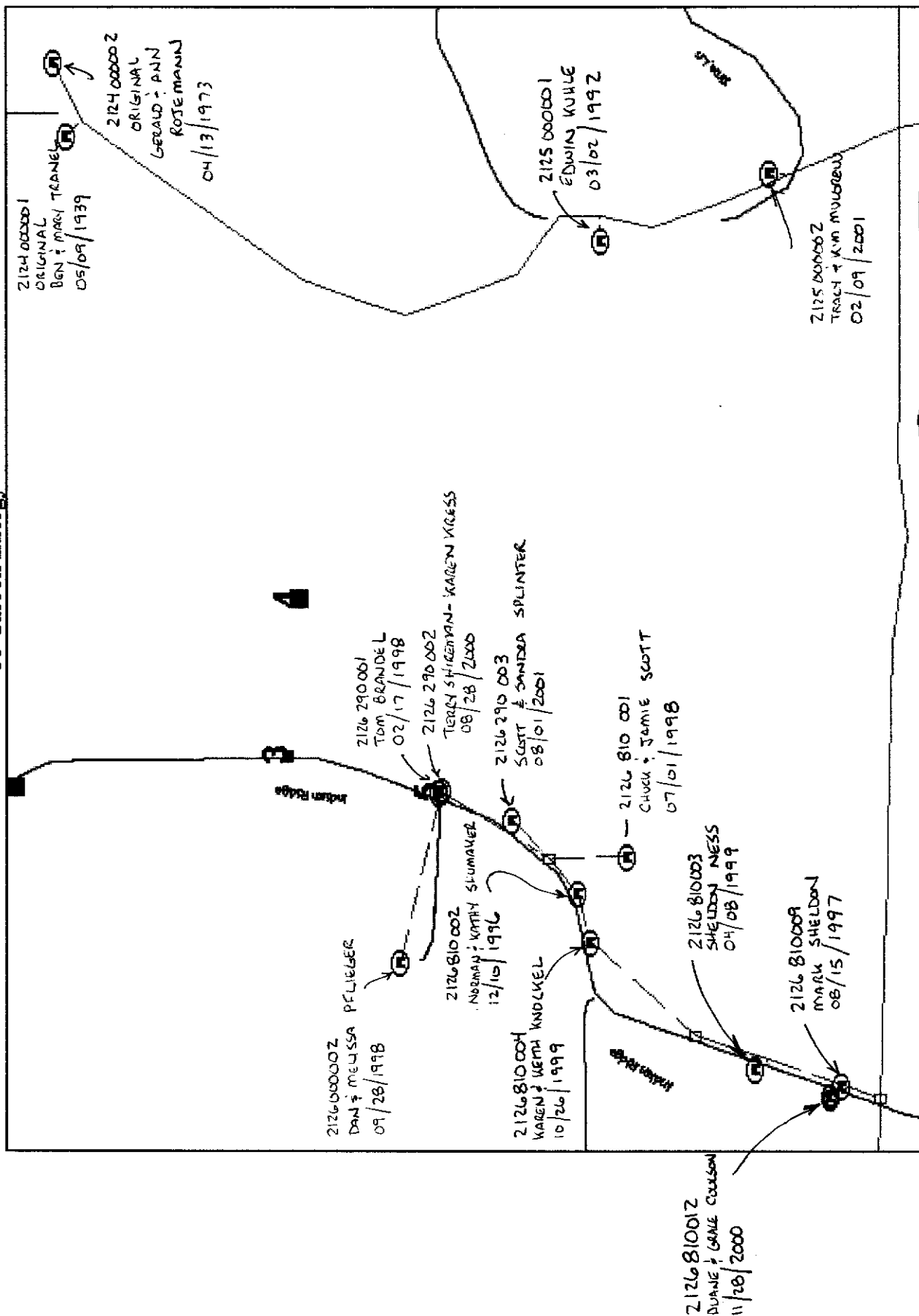
Customer
Rowe

To Carroll
Post 1965
line

EXHIBIT 1



Jo-Carroll Energy



*** JO-CARROLL ELECTRIC COOPERATIVE ***
DATE 12/04/96
TIME 11:40:24 WORK ORDER COVER/STAKING SHEET

PAGE 1
W02027

WO NO: 96-00198 NC URD LINE EXT

EXHIBIT 3

NAME: SNYDER, DAN NEW CONSTRUCTION

COMMENT: SNYDER VIEW SUBDIVISION ON N INDIAN RIDGE ROAD

LOCATION : 2A26SV
CUSTOMER NO: 00000

DISTRICT NO: HOME PHONE:

TOTAL EST COST: .00

ENGINEERED BY: JHM DATE: 11/14/96

ELECTRIC PERMIT #: ELECTRICIAN:

BILLING: A.I.C.:

METER #: READING:

FOREMAN: DATE: VOLTAGE:

LOCATION: 96198-100

SOURCE LOCATION: 100

TYPE	ASSEMBLY	EX	RET	ADD	COMM-PART NO	C/H	LAST WO NO
POLES	35X5			1			
PH 1 PH	A1			1			
PH MISC	M5-6			1			
AD	UA1			1			
	UG-7			1			
	UM1-10			3			
	UM1-5			1			
	UM3-14			3			
	UM48-1			4			
	UM6-1			7			
	UM6-20			3			
	UM6-34			1			
6.PRI.	1-1/0 220			2,718			

Open _____
 Done _____
 Closed _____

JO-CARROLL ELECTRIC COOPERATIVE, INC.

BURIED DISTRIBUTION STAKE SHEET

Snyder View Subdivision ILLINOIS 44

Map No. 2A26 S.V.

Location North Indian Ridge Rd

V.O. 96-198

Sheet 1 of 3

Staked JHM 14 Nov 96 15°

Code 101

Sub 20 Circuit 4 Code 70 Phase C Primary Wire No. & Size 1-1/0 220 ml Type EPR

1146
 15 22
 26 68
 50
 27 18
 2682
 38

LOCATION	LENGTH TRENCH	LENGTH CABLE	UM-5-1 ELBOW	UM-48-1 GRND.	UM-3-14 1P BOX	UM-6-20 2PT	UM-1-5 PAD	UG-7 15KV	UM 6-34 MOVE	UAI RISER	UM-1-10 Loop SLEEVE	Post SIGNS UM 12-1 12-2 DANG. CAUT.
SHOULDER LINE START		1-1/0										
NEW RISER Pole LOT 10	7									1		1
RISER BOX	2' 40'	2	1	1	1							
Loop Lot 10/9	230	250									1	1
Loop Lot 8/7	440	460									1	1
Box Lot 6/5	440	460	2	1	1	1						
Loop Lot 4/3	915	925									1	1
UG-7 Lot 3/2	270	285	2	1			1	1				
END AT Box Lot 2/1	245	260	1	1	1	1		1				
PROPOSE TOTAL		2680										
ACTUAL		2718										

TRENCHING BY DEVELOPER

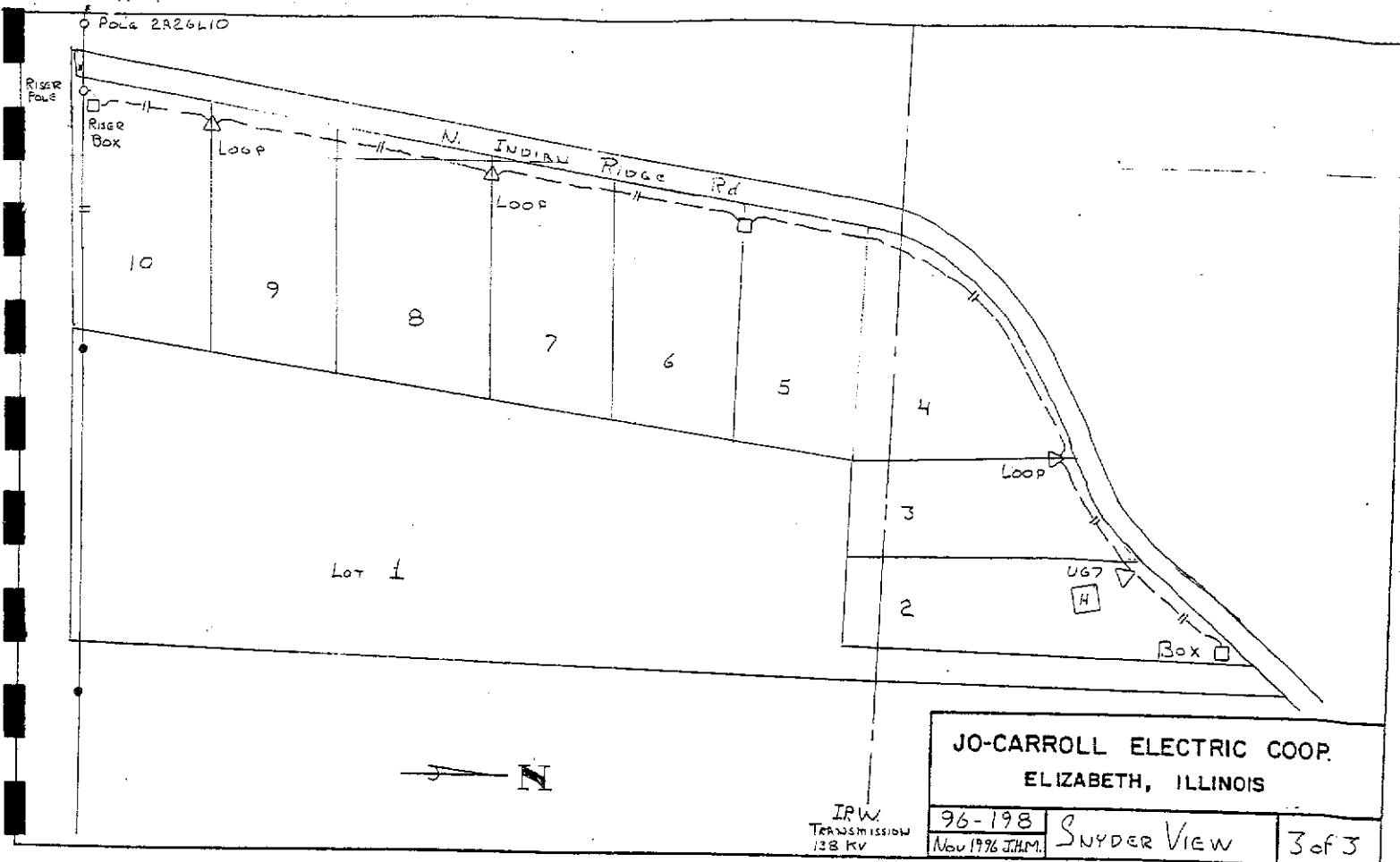
Code 101

Sub 20 Circuit 1 Node 70 Phase C Primary Wire No. & Size _____ Type _____

[illegible]

CHARGE OUT ARRESTOR ON POLE 2A26L10

PLACE NEW A1 RISER POLE IN LINE ON LOT 10
RISER MATH ON SHEET 1 of 3



DATE 2/18/97

REA FORM 219

PAGE 1

*** JO-CARROLL ELECTRIC COOPERATIVE ***
INVENTORY OF WORK ORDERS FOR THE MONTH OF JANUARY 1997
REA INVENTORY NUMBER - 472

WORK PLAN/YEAR		***** FUNDS REQUIRED *****			***** DEDUCTIONS *****			
WORK ORDER NO	BUDGET	COST OF	COST OF	ORIGINAL	SALVAGE	SALVAGE	CONTRIBUTION	
CONSTR	RETIRE	ITEM	CONSTRUCTION	REMOVAL SI	COST OF	SI ONLY	RET W/O REP	
				REPLACE			IN AID	
							LOAN FUNDS	

75-00125 0 21.08.1997

9,250.00 1,819.14

332.000 00 CABLE REPLACEMENT

DATE 3/05/1978

REA FORM 219

EXHIBIT 4

• * * JD-CARROLL ELECTRIC COOPERATIVE • * *
DATE 3/06/98
TIME 7:54:05 WORK ORDER COVER/STAKING SHEET

PAGE 1

Ex 4

WO NO: 97-00394 NC URD LINE EXT

NAME: KUHLES, ED

COMMENT: NEW SUBDIVISION JUST PAST SNIDER VIEW

LOCATION : 2A26EK 01 TO 04
CUSTOMER NO: 00000

DISTRICT NO: HOME PHONE:

TOTAL EST COST: .00

ENGINEERED BY: DATE:

ELECTRIC PERMIT #: ELECTRICIAN:

BILLING: A.I.C.:

METER #: READING:

FOREMAN: DATE: VOLTAGE:

LOCATION: 97394-100

SOURCE LOCATION: 100

TYPE	ASSEMBLY	EX	RET	ADD	COMM-PART NO	C/H	LAST WO NO
URD	UM1-10	1		1			97-00394
	UM48-1	1		1			97-00394
	UM6-1	2		2			97-00394
	UM6-34		1	1			97-00394
UG.PRI.	1-2 220	784		784			97-00394

DATE 3/05/1998

REA FORM 219

PAGE 1

*** JO-CARROLL ELECTRIC COOPERATIVE ***
INVENTORY OF WORK ORDERS FOR THE MONTH OF FEBRUARY 1998
REA INVENTORY NUMBER 495

System Designated - ILLINOIS 44 CARROLL

Name of Borrower - JO-CARROLL ELECTRIC CO-OP

***** FUNDS REQUIRED ***** DEDUCTIONS *****

WORK PLAN/YEAR	BUDGET	COST OF	COST OF	ORIGINAL	SALVAGE	SALVAGE	CONTRIBUTION	LOAN FUNDS
WORK ORDER NO	ITEM	CONSTRUCTION	REMOVAL SI	COST OF	SI ONLY	RET W/O REP	IN AID	
CONSTR	RETIRE			REPLACE				
0000.000	1995							

97-00394 97-00394 2,097.53

2,097.53

Open _____

Done 12-15-97 12/15

Closed _____

JO-CARROLL ELECTRIC COOPERATIVE, INC.

BURIED DISTRIBUTION STAKE SHEET

ILLINOIS 44

Map No. 2A26EKO1004 Location INDIAN RIDGE RdW.O. 97-394Sheet 1 of 1Staked JHM 2 Dec 97Code 101Sub 20 Circuit 1 Mode 70 Phase C Primary Wire No. & Size 1-#2 220 ML Type E.P.R.

MINI

LOCATION	LENGTH TRENCH	LENGTH CABLE	UM 6-1 ELBOW	UM 48-1 GRND.	UM 6-11 CRP	UM 8-34 Mave.	UM 1-10 LOOP	UM 1-10 Succu.	UM 1-10 PND	UG7 IS KUN	SIGNS UM	
											12-1 DANG.	12-2 CAUT.
EXIST 136X SNIDERVIEW 2		1-10 #2	1		*1							
LOOP ^{LOT} 3/4	190'	210					1					
UG7 ^{LOT} 1/2	420'	435'	1	1		1		1	1	1		

EXTEND PRIMARY FROM EXIST. BOX
TO LOOP & UG7

HSE TO BE BUILT ON LOT 1 SPRING 98.

Ground Resistance Test = 18 Ω

JHM 94

JO-CARROLL ELECTRIC COOPERATIVE
SERVICE ORDER

12/16/97

Service Order # 13012

CUSTOMER INFORMATION

CUST # 10394-5 ACCOUNT # 2A24EK
MEMBER # WO # 97-394
ROUTE 99 STOP RATE R

NAME KUHLEY, ED
16400 W Timms Lane
EAST DUBUQUE IL
61025
PHONE #

SERVICE ORDER INFORMATION

CN-CN-NEW SERVICE NO WO TIE

SCHEDULED 12/01/97
TAKEN BY SMG
DATE 12/02/97 TIME 2:59 PM
REQ BY ED KUHLES
REQ CODE

SERVICE INFORMATION

S/LDC

M/LDC

FIXED CHARGES

Mtr Note

Notes

Sub. 20 Ohms 16 Noding 70 Phase C Circuit 1

NEW READINGS
Electric Elec-2 Elec-3

Transformer
Installed

METER NO

Date 12/15/97

SEAL NO

Size 15KVA

MULTIPLIER

S.N. 971087874

CURR READ

Mfg. COOPER

READ DATE

Type Urd

WINTER PK

☒ New () Used

SUMMER PK

METER INFORMATION

MFG _____ VOLTS _____ AMPS _____ PHASE _____ WIRES _____ TYPE _____
SEAL _____ MULT _____ DIALS _____ DMD _____ INSTALL _____

COMMENTS "METER EQUIPMENT CHG = 0"

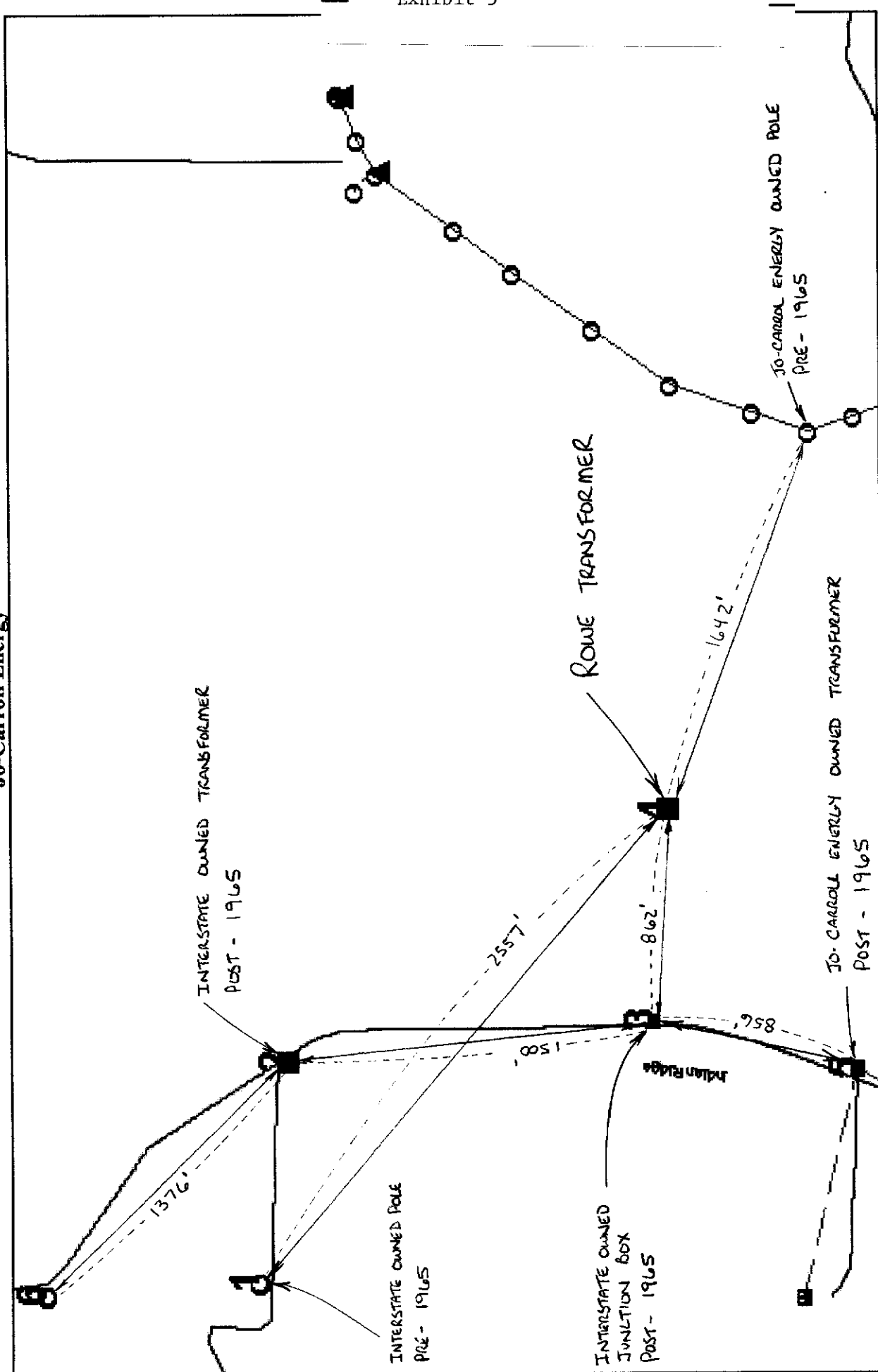
LINE EXTENSION FOR FOUR LOT SUBDIVISION ADJACANT TO SNYDER VIEW

QUOTE SENT 4 DEC 97
HSG TO BE BUILT BY OTHER
IN 1998.

COMPLETED BY 12-15 DATE 12-15-97 TIME _____ KEYED _____



Jo-Carroll Energy



JB CARROLL ENERGY

MATERIAL TIE

FROM TERMINAL # 976

JOB # 201

DESC	ROWE, JAMIE	MBRNO	STATE	1 DESIRED 09/01/02
WO NO	1 LOCATION	2123	CNTY	1 APPLDTE 08/16/02
WKPLAN	02 0102 CREW	TAXCD	CITY	STKDATE
WHS NO	1 STAKED BY J2		DIST	10 RELDTE
COMMENTS: 2A23 NEW SERVICE				

STATISTICS	PRIM	SECD	SERV	TRAN	CONS	SL	MET	TRA	POLE	INC	CAPC
CONST: OVERHEAD											
UNDERGRD											
RET : OVERHEAD											
UNDERGRD											

DESCRIPTION	CONST NO	REC UNIT	INSTALL	RETIRE
CONDUCTOR, #2 ACSR	2-2 ACSR		1642	
POLE 35 CLASS 5	35X5		7	
1 PH SGL PRIM SUPPORT	A1		6	
1 PH DEADEND	A5		2	
GUY, 3/8 DOWN	E1-2		2	
ANCHOR, 10000 LBS HELIX	F1-3S		2	
TRANS, 0/H 1 PH CSP	G106		1	
GROUND, DRIVEN	M2-1		1	
ANCHOR GUY		99364010	2	
POLE, 35 AND UNDER		99364040	7	
GROUND		99365030	1	
INSULATOR STRING		99365040	2	
CONDUCTOR, #2 ACSR		99365140	3284	

MAJOR MATERIAL ITEMS

DESCRIPTION	MAT ITEM	INSTALL	RETURN	SALVAGE
ANCHOR, HELIX 10"	00995052	2		0
CLAMP, DEADEND	11722226	4		0
CONDUCTOR, #2 ACSR SPARATE	16110201	3284		0
STIRRUP ASSEMBLY 2-6	17081352	1		0
CLAMP, HOT LINE 6-1/0 TO 8-1/0	17411976	1		0
GUTHRIE SQUIRREL GUARD	18055502	1		0
INSULATOR, PIN TYPE	34223213	6		0
INSULATOR, SUSPENSION - EPOXY	34276031	2		0
POLE, 35 FT CLASS 5	48003550	7		0
ANCHOR RODS 3/4 X 7 PISA	53634307	2		0
GROUND ROD, 5/8" X 8' COPPER	53928500	1		0

FAX NO. P. 09
INTERNAL FILE CASE 2
JOB # 20195 RUN DATE 12/12/03 11:44 AM

DESCRIPTION	MAT ITEM	INSTALL	RETURN	SALVAGE
-------------	----------	---------	--------	---------

BUY STRANDVISE 3/8"	60616152	2	0
---------------------	----------	---	---

DESCRIPTION	MAT ITEM	INSTALL	RETURN	SALVAGE
-------------	----------	---------	--------	---------

JOB ESTIMATION COST

COOP/CONTRACT	INSTALL	RETIRE	CONTRACT	
HOURS	109.53	.00	INSTALL HOT	.00
LABOR	2,572.86	.00	INSTALL COLD	.00
OVERHEAD	3,216.08	.00		
MAJ MAT	1,604.21	.00	RETIRE HOT	.00
MINOR MAT	.00	.00	RETIRE COLD	.00
TRANSPORTATION	1,286.43	.00		
STORES	192.51		EST HOURS	109.53
			EST LABOR	2,572.86
TOTAL	8,872.09	.00	EST MAT	1,604.21
			EST OH	3,216.08
NET	8,872.09			

RELEASED BY	RELEASED DATE	CREW

COMPLETED BY _____ COMPLETED DATE _____

12/12/03 11:38 AM

JO-CARROLL ENERGY

MATERIAL TICKET

PAGE

2

FROM TERMINAL # 976

JOB # 20195

RUN DATE 12/12/03 11:38 AM

WRITE-IN ITEMS

DESCRIPTION

MAT ITEM

INSTALL

RETURN

SALVAGE

JOB ESTIMATION COST

COOP/CONTRACT

INSTALL

RETIRE

CONTRACT

HOURS

38.72

.00

INSTALL HOT

.00

LABOR

909.53

.00

INSTALL COLD

.00

OVERHEAD

1,136.91

.00

MAJ MAT

1,470.90

.00

RETIRE HOT

.00

MINOR MAT

.00

.00

RETIRE COLD

.00

TRANSPORTATION

454.77

.00

STORES

176.51

EST HOURS

38.7

EST LABOR

909.5

TOTAL

4,148.62

.00

EST MAT

1,470.9

EST OH

1,136.9

NET

4,148.62

RELEASED BY

RELEASED DATE

CREW

COMPLETED BY

COMPLETED DATE